

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a	§	
BRAZOS LICENSING AND	§	
DEVELOPMENT,	§	
Plaintiff,	§	Case No. 6:20-cv-580-ADA
v.	§	JURY TRIAL DEMANDED
GOOGLE LLC,	§	
Defendant.	§	

STIPULATION AND JOINT MOTION FOR PARTIAL SUMMARY JUDGMENT

Under Federal Rule of Civil Procedure 56, Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing & Development, LLC (“Plaintiff”) and Defendant Google LLC (“Defendant”) respectfully submit this stipulation and joint motion for partial summary judgment of non-infringement on all claims asserted against Defendant’s Barhopper v1 functionality.

WHEREAS, Plaintiff previously accused Defendant’s Barhopper v1 functionality of infringing the sole patent it asserts in this action, U.S. Patent No. 7,946,491 (the “’491 patent”);

WHEREAS, Defendants denied any infringement by Defendant’s Barhopper v1 functionality;

WHEREAS, Plaintiff requested and Defendant provided discovery;

WHEREAS, following discovery, Plaintiff no longer asserts that Defendant’s Barhopper v1 functionality infringes any claim of the ’491 patent;

NOW, THEREFORE, Plaintiff and Defendant respectfully move the Court to enter partial summary judgment that Defendant’s Barhopper v1 functionality does not infringe any claim of the patent asserted in this action. Good cause exists for this agreed motion, as set forth

above. Plaintiff and Defendant respectfully request that the Court enter the proposed order submitted with this joint motion.

Date: April ___, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on ____, 2023, I filed the foregoing Stipulation and Joint Motion for Partial Summary Judgment under Local Rule CV-5 and served it on counsel of record through the Court's electronic filing system.
